

Honorable Ricardo S. Martinez

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

MICROSOFT CORPORATION, a  
Washington corporation,

Plaintiff,

v.

BORIS MIZHEN; MEDIA NETWORK,  
INC.; NEW AGE OPT-IN, INC.; I-  
PERMISSION, INC.; DMITRI  
KOVALSKY; MUHAMMED MOHSAN  
UL MOULA; ESOLUTIONS  
TECHNOLOGY, INC.; DECAPTCHER;  
AND JOHN DOES 1-20,

Defendants.

Case No. 2:10-cv-00966-RSM

**STIPULATED MOTION FOR ENTRY OF  
STIPULATED JUDGMENT AND  
INJUNCTION AND STIPULATED  
MOTION TO DISMISS**

**NOTE ON MOTION CALENDAR:  
JUNE 6, 2011**

**CLERK'S ACTION REQUIRED**

Plaintiff Microsoft Corporation ("Microsoft") and Defendants Boris Mizhen, Media Network, Inc., New Age Opt-In, Inc., I-Permission, Inc., and Dmitri Kovalsky (collectively, "the Parties"), have resolved their dispute subject to the Stipulated Judgment and Stipulated Permanent Injunction submitted with this motion. Pursuant to the provisions of Fed. R. Civ. P. 58, 41(a)(1)(A)(i), and 41(a)(1)(A)(ii), Microsoft and Defendants Boris Mizhen, Media Network, Inc., New Age Opt-In, Inc., I-Permission, Inc., and Dmitri Kovalsky agree and stipulate as follows:

Microsoft and Defendants have agreed and stipulated to entry of Judgment Against Media Network, Inc., New Age Opt-In, Inc. and I-Permission, Inc., ("Stipulated Judgment") submitted as Exhibit A to this motion. The Parties jointly move the Court to enter the Stipulated Judgment.

STIPULATED MOTION TO DISMISS  
2:10-CV-00966-RSM

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Microsoft and Defendants have agreed and stipulated to the Stipulated Permanent Injunction and [Proposed] Order (the “Stipulated Injunction”) against Boris Mizhen, Media Network, Inc., New Age Opt-In, Inc., I-Permission, Inc. and Dmitri Kovalsky, submitted as Exhibit B to this motion. The Parties jointly move the Court to enter the Stipulated Injunction.

Microsoft, by and through its counsel of record, hereby dismisses with prejudice all claims asserted by it against defendants Boris Mizhen and Dmitri Kovalsky in the above-captioned matter.

Microsoft, by and through its counsel of record, hereby dismisses without prejudice, and without waiver of any of its rights, all claims asserted by it against defendants Muhammed Mohsan Ul Moula, Esolutions Technology, Inc., Decaptcher, and John Does 1-20 in the above-captioned matter. Defendants Muhammed Mohsan Ul Moula, Esolutions Technology, Inc., Decaptcher, And John Does 1-20 have not yet answered or otherwise appeared, thus dismissal is appropriate pursuant to Fed. R. Civ. P. 41(a)(1)(A)(i). Defendants Boris Mizhen, Media Network, Inc., New Age Opt-In, Inc., I-Permission, Inc. and Dmitri Kovalsky do not oppose the foregoing dismissals.

Each side will bear its own fees and costs.

The Parties have agreed and stipulated to an Order of Dismissal, submitted as Exhibit C to this motion. The Parties jointly request that the Court enter the proposed Order of Dismissal.

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